

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

POST ACUTE ANALYTICS, INC.,

Plaintiff,

v.

CVS PHARMACY, INC. and AETNA LIFE
INSURANCE COMPANY,

Defendants.

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C.A. No.

MOTION FOR LEAVE TO FILE COMPLAINT UNDER SEAL

Plaintiff Post Acute Analytics, Inc. (“PAA” or “Plaintiff”), by and through its undersigned attorneys, hereby moves for leave to file under seal its Complaint against Defendants CVS Pharmacy, Inc. and Aetna Life Insurance Company (together, “Defendants”) and, in support thereof, states as follows:

1. Plaintiff’s Complaint asserts claims against Defendants arising from Defendants’ willful failure to pay the fees they owed to Plaintiff for contracted services Plaintiff performed between January 2022 and July 2023 with respect to Defendants’ Medicare Advantage Plans.

2. A substantial amount of information cited and relied upon in the Complaint consists of the terms of PAA’s agreement with the Defendants (“the Agreement”) and confidential pricing and commercially-sensitive business/financial information related to the Agreement, in which such information is specifically designated “Confidential Information”¹ not to be disclosed publicly. To the best of Plaintiff’s knowledge, none of this information is publicly available.

¹ Such “Confidential Information” includes, for example, confidential pricing and terms of the Agreement, as well as business plans, strategies, and other commercially-sensitive, non-public business arrangements or prospects.

3. Accordingly, because of the confidential nature of the information contained in the Complaint, Plaintiff respectfully submits that good cause exists to file the Complaint under seal.

4. Additionally, should the Court grant Plaintiff's motion for leave to file the Complaint under seal, pursuant to the Court's procedures for filing documents under seal, Plaintiff shall file a redacted public version of the Complaint within seven (7) days of docketing of the Sealed Complaint.

WHEREFORE, Plaintiff respectfully requests that the Court grant this motion for leave to file the Complaint under seal.

Dated: September 5, 2023

Respectfully submitted,

OF COUNSEL:

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